

PLUMAS COUNTY FLOOD CONTROL & WATER CONSERVATION DISTRICT



December 9, 2008

Mary Nichols
Chair, California Air Resource Board
1001 I Street
Sacramento, California 95814

Re: Comments on AB32 Scoping Plan

Dear Chair Nichols:

While the AB32 Scoping Plan establishes a tremendous framework for California's response to climate change, its failure to sufficiently address climate adaptation bypasses significant opportunities and falls short of important objectives established by the Legislature.

The Scoping Plan seeks to provide positive overall environmental and economic benefits for California. However, AB32 itself anticipated that even a highly successful program would not avoid all of the negative environmental consequences of climate change or an uneven distribution of impacts. For those reasons, the Legislature emphasized its intent to achieve environmental co-benefits and to address localized impacts that fall disproportionately on disadvantaged communities and small businesses.

Appendix J, the functionally equivalent document presented to satisfy CEQA requirements for the Scoping Plan, fails to consider the trade offs between environmental impacts and benefits at an appropriately local scale. Appendix J should emphasize analysis of localized environmental benefits and a least environmentally damaging alternative for California. Instead, the anticipated environmental benefits from AB32 rely too heavily upon success in the regional, national, and even global carbon markets.

The risk in all of this is that the dollars of California's taxpayers, ratepayers, and consumers will scatter with the four winds. Instead, by effectively incorporating climate adaptation, the Scoping Plan could help ensure that reinvestment is targeted back into California to address the wide range of practical challenges we currently face, including helping our forests and watersheds adapt to the changing climate. Including these types of adaptation actions in the Scoping Plan will achieve environmental co-benefits for communities throughout California. Deferring adaptation will defer any such benefits and also defer actions that could slow or reverse the trends of intensifying wildfires and diminishing snowpack. The consequences of deferral will fall upon California's communities as they spend more and more summer days choking on smoke and more and more dollars trying to replace lost drinking water, among the many other challenges they will need to meet.

To effectively address environmental co-benefits and localized impacts, climate adaptation should have equal footing with the many other components of the AB32 program. This sentiment was reflected strongly at the recent Fifth Annual Climate Change Research Conference

in Sacramento, where participants placed emphasis on eliminating presumed priorities and distinctions between greenhouse gas reductions, mitigation, and adaptation.

The Air Resources Board could take the following step to move toward incorporating climate adaptation in the AB32 program:

1. Make a finding that climate adaptation planning is in the interest of the AB32 program for the benefit of people of California and have the Scoping Plan call for the dedication of a portion of AB32 program revenue to local and regional climate adaptation studies and demonstration projects having potentially significant benefits to the overall program.
2. Pursue an MOU with the Resources Agency and the California Energy Commission that would specify how the three parties will work together to provide incentives for local climate adaptation planning and actions that maximize local environmental co-benefits and benefits to disadvantaged communities, while at the same time achieving measurable greenhouse gas reductions and carbon storage.
3. Make a finding that investing strategically in local adaptation plans and projects can help ensure California's dollars are put to work inside California to provide benefits for our citizens and communities.

In previous comments on the Scoping Plan, we have presented the case that landscape-based greenhouse gas reduction alternatives cannot compete with technology-based solutions in the global carbon market. Landscapes are too dynamic and too complex to be easily digestible by an open market, but they are still a critical component of a sustainable future in California. In fact, the recent draft of the California Climate Adaptation Strategy for the Biodiversity and Habitat Sector argues that landscape-based greenhouse gas reductions and carbon storage are a safety net for California's environment against the changing climate.

For all of these reasons, a final component of the AB32 Scoping Plan should be a landscape-based and integrated program for greenhouse gas reductions, carbon sequestration, and climate adaptation.

Sincerely,

/s/ Brian L. Morris

Brian L. Morris
General Manager

cc Mike Chrisman, Secretary for Resources
Regional Council of Rural Counties